Compliance Monitoring & Indicator 13: Bricks & Mortar

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Exceptional Student Services

Session Outcomes

- To gain knowledge of secondary transition requirements and compliance monitoring standards

- To understand different ways to show transition planning and document compliance:
  - ✓ **Compliance**
  - ✓ **Unacceptable or "Out"**
  - ✓ **Best Practice**

What is Indicator 13?

Indicator 13: Transition Services for Students

Percent of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon age appropriate transition assessment, transition services, including courses of study, **that will reasonably enable the student to meet those postsecondary goals,** and annual IEP goals related to the student's transition services needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority.

(20 U.S.C. §1416(a)(3)(B))

Eight Components

1. Measurable Postsecondary Goals
2. Updated Annually
3. Based on Age-Appropriate Transition Assessment
4. Transition Services = Coordinated Set of Activities
5. Transition Services = Courses of Study
6. Annual Goals
7. Student Invitation
8. Agency Participation

Compliance in Transition Planning and Documentation

- **Compliance:** Planning and documentation is individualized and addresses transition-related FAPE and can be considered compliant under the language of IDEA '04 and OSEP's Indicator 13 guidance.

  Refer to the ADE/ESS 2011-2012 Arizona Monitoring System Manual, September 2009 Special Education Monitoring Alert, and NSTTAC Checklist for additional information.

- **Unacceptable or "Out":** Planning and documentation does not meet Indicator responsibilities and will result in an "Out" call during monitoring. It is likely that FAPE is not being provided and the PEA is vulnerable to complaints and due process issues.

- **Best Practice:** Planning and documentation reflects effective transition practices, is individualized and addresses transition-related FAPE, meets the **"stranger test,"** and assists PEAs in avoiding confusion, disagreement, or more significant problems. This level of documentation usually requires increased effort.

Monitoring Guide Steps: Transition

III.A.6: For students 16 years of age or older, documentation of required secondary transition components.
(Pages D35-D43)

Indicator 13 Component #1: Measurable Postsecondary Goals

<u>III.A.6:</u> Documentation of measurable postsecondary goals (MPGs) in the areas of education, training, and employment, and, when appropriate, independent living skills. (Page D35-D36)

Measurable Postsecondary Goals (MPGs)

Compliance: Required MPG areas are:

1. Training / Education
2. Employment
3. Independent Living Skills (where appropriate)

Measurable Postsecondary Goals (MPGs)

Best Practice: Criteria for an effective MPG:

- **Clearly** written to occur *after* exiting secondary education, (for example: "After graduation...")
- are measurable outcomes, and
- completion could occur many years into the future, not just one year out.

Measurable Postsecondary Goals (MPGs)

Compliance:
- are in all required areas,
- reflect student strengths, preferences & interests,
- *imply* completion post-graduation, and
- are measurable.

Unacceptable or "Out":
- no MPGs present or all required areas not addressed; not based on strengths, interests & preferences.

Best Practice:
- are in all required areas,
- reflect student strengths, preferences & interests,
- *clearly* state completion will occur post-graduation, and
- are <u>measurable</u> postsecondary outcomes.

Measurable Postsecondary Goals (MPGs)

Example #1:

Compliance:
Jeff will be a motorcycle mechanic.

Unacceptable or "Out":
Jeff is interested in working with motorcycles.

Best Practice:
After graduation, Jeff will work as a motorcycle mechanic for Harley-Davidson.

Measurable Postsecondary Goals (MPGs)

Example #2:

Compliance:
Linda will enroll at ASU.

Unacceptable or "Out":
Linda will research going to college.

Best Practice:
Upon completion of school, Linda will enroll in the mechanical engineering program at ASU.

Indicator 13 Component #2: Updated Annually

III.A.6: Documentation that measurable postsecondary goals are updated annually.
(Page D36)

Updated Annually

Compliance:
- Postsecondary goals were addressed / updated in conjunction with the development of the current IEP.

Unacceptable or "Out":
- Expired IEP.

Best Practice:
- MPGs change each year as a result of information from formal / informal assessment.
- MPGs change as a result of activities and coursework completed the year before.
- MPGs increase in specificity.

Updated Annually

Example:

Compliance:
- Date on a current IEP is within 365 days of the previous IEP date.

Unacceptable or "Out":
- Expired IEP.

Best Practice:
- *Freshman Goal:* After graduation, Ann will work with children.
- *Sophomore Goal:* After graduation, Ann will work as a teacher in early childhood education.
- *Junior Goal:* After graduation, Ann will work as a preschool teacher in a local PEA.
- *Senior Goal:* After graduation, Ann will work as a preschool teacher in Phoenix Elementary School District.

Indicator 13 Component #3: Age-Appropriate Transition Assessment

III.A.6: Documentation that the measurable postsecondary goals were based upon age-appropriate transition assessment(s).
(Page D41)

Age-Appropriate Transition Assessment

Compliance:
- IEP has information that correlates the results of age-appropriate assessment(s) with the strengths, preferences, and interests of the student for each MPG.
- Classroom / job performance information in the IEP correlates with the stated MPGs.

Age-Appropriate Transition Assessment

Compliance:

Example:

MPG = After graduation, Larry will work in law enforcement.
- The assessment section of the IEP states: "Student Interview" and "Report from the ROTC Teacher."
- The PLAAFP states: "Larry's interest and preference is to be a policeman. This summer he attended the police-sponsored summer camp. His ROTC teacher states that he is a good student."

Age-Appropriate Transition Assessment

Unacceptable or "Out":

- No documentation of any age-appropriate transition assessment(s).
- Boilerplate statements.
- No evidence of transition assessment(s) information even though measurable postsecondary goals are present.
- The transition planning interview identifies preferences and interests only, not the student's strengths.
- Assessment(s) in the IEP and / or information from assessment(s) do not support the MPGs with information about the student's strengths, preferences, or interests.

Age-Appropriate Transition Assessment

Unacceptable or "Out":

Example:

MPG = After graduation, Larry will work in law enforcement.

- The assessment section of the IEP states: "student interview."
- The PLAAFP states: "Larry has had 23 discipline referrals for fighting this past year. Larry has significant problems following instruction. His ROTC teacher states that he is failing ROTC."

Age-Appropriate Transition Assessment

Best Practice:

- Assessment(s) are clearly described.
- IEP has a statement of how the results of the information from specific formal/informal age-appropriate assessment(s) supported, as written, each MPG (i.e., information in the statement identifies strengths, preferences, and interests that support selection of the MPGs). This statement clearly identifies which assessment provided the information used to write each MPG.
- Actual classroom/job performance demonstrating required job skills for the MPG are described in the IEP and used as an informal assessment to support the MPGs.

Age-Appropriate Transition Assessment

Best Practice:

Example:

MPG = After graduation, Larry will work as a policeman for the Chinle Police Department.

- The assessment section of the IEP lists: ASVAB, report from teacher in ROTC, and student interview of a current police officer.
- The strengths, interests, and preferences section of the IEP states how information from formal and informal assessments support the MPGs: "The ASVAB score indicates a strength area as being in the military police," and "His ROTC teacher indicates he is a great candidate for the military."

Indicator 13 Component #4: Coordinated Set of Activities

III.A.6: Documentation of at least one transition service / activity that focuses upon improving the academic and functional achievement of the student to facilitate movement from school to post-school as identified in the measurable postsecondary goals.
(Pages D38-D39)

Coordinated Set of Activities

Transition services include the areas of:

1. Instruction
2. Community Experiences
3. Related Services
4. Employment
5. Adult Living
6. Functional Vocational Evaluation
7. Daily Living Skills (if appropriate)

Coordinated Set of Activities

Compliance:
- Services / activities are only given in areas that will reasonably enable the student to meet the measurable postsecondary goals.
- A specific service / activity that can reasonably be expected to enable a student to achieve his or her MPGs.
- A single service / activity that supports one or all MPGs.

Unacceptable or "Out":
- Services / activities are not correlated with the MPGs.
- Services / activities are not individualized.
- Generic services / activities.

Best Practice:
- IEP has information that addresses all areas and clearly identifies specific services / activities that the student will complete to reasonably enable him or her to achieve each MPG.
- Multiple activities.

Coordinated Set of Activities

Compliance:

Example:

MPG: After completion of school, Ray will enroll in a diesel mechanic certification program.

Instruction
Receive instruction on how to apply to a training program and research scholarship opportunities.

Adult Living
At the beginning of senior year, Ray will visit a diesel mechanic certification program.

Coordinated Set of Activities

Unacceptable or "Out":

Example:

MPG: After completion of school, Ray will enroll in a diesel mechanic certification program.

Instruction
Required courses for graduation.
Field trips; volunteer; visit the mall.

Employment
Will look for work.

Adult Living:
Will get a driver's license.

Coordinated Set of Activities

Best Practice:

Example:

MPG: After completion of school, Ray will enroll in the UTI-Diesel Mechanic certification program.

Instruction
Receive instruction on how to apply to UTI and research scholarship opportunities.

Community Experiences:
Use *Community Information and Referral* to identify 3 strategies to establish transportation to UTI-Phoenix.

Employment
Participate in job shadowing at a diesel mechanic facility. Obtain part-time or summer employment at NAPA Auto Parts store.

Adult Living
At the beginning of senior year, Ray will visit UTI-Phoenix.

Indicator 13 Component #5: Courses of Study

III.A.6: Transition services include courses of study that focus on improving the academic and functional achievement of the student to facilitate the movement from school to post-school.
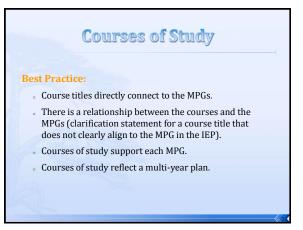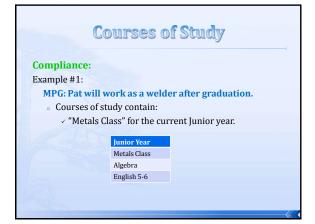
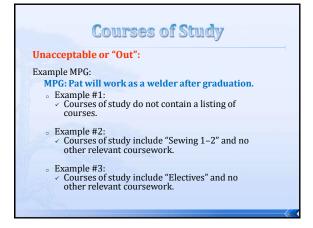(Page D42)

Courses of Study

Compliance:
- Course titles correlate with the MPGs.
- At least one course within the courses of study correlates with an MPG.
- Courses of study reflect current year of planning only.

Courses of Study

Unacceptable or "Out":

- Course titles contraindicate the student's reasonably achieving the MPGs (e.g., student's MPG is to become an accountant and student is only taking remedial math courses in a self-contained setting).
- No connection between courses listed and MPGs or there is no clarification statement that aligns the course to the goal.
- No courses listed.
- Course of study not individualized (e.g., course of study is the same as that of a general education student).

Courses of Study

Best Practice:

- Course titles directly connect to the MPGs.
- There is a relationship between the courses and the MPGs (clarification statement for a course title that does not clearly align to the MPG in the IEP).
- Courses of study support each MPG.
- Courses of study reflect a multi-year plan.

Courses of Study

Compliance:

Example #1:

MPG: Pat will work as a welder after graduation.

- Courses of study contain:
  - ✓ "Metals Class" for the current Junior year.

Junior Year
Metals Class
Algebra
English 5-6

Courses of Study

Compliance:

Example #2:

MPG: Pat will work as a welder after graduation.

- Courses of study contain:
  - ✓ "Freshman Careers" class.
  - ✓ "Business Math" class.

Freshman	Sophomore	Junior	Senior
Freshman Careers	Biology	Business Math	Algebra 1
English 1-2	English 3-4	English 5-6	Senior English 7-8
Choir 1-2	Choir 3-4	Introduction to Art	Weight Training

Courses of Study

Unacceptable or "Out":

Example MPG:

MPG: Pat will work as a welder after graduation.

- Example #1:
  - ✓ Courses of study do not contain a listing of courses.
- Example #2:
  - ✓ Courses of study include "Sewing 1–2" and no other relevant coursework.
- Example #3:
  - ✓ Courses of study include "Electives" and no other relevant coursework.

Courses of Study

Best Practice:

Example #1:

MPG: Pat will work as a welder after graduation at Max's Welding Services.

- Courses of study contain:
  - ✓ "Welding for Industry" class.
  - ✓ Each year (Freshman–Senior years).

Freshman	Sophomore	Junior	Senior
Welding for Industry 1-2	Welding for Industry 3-4	Welding for Industry 5-6	Welding for Industry 7-8
English 1-2	English 3-4	English 5-6	English 7-8
Intro to Computers	Business Math	Weight Training	Adv. Weight Training

Courses of Study

Best Practice:

Example #2:

MPG: Pat will work as a welder after graduation at Max's Welding Services.

- Connection to MPG is documented in the IEP:
  - ✓ "Sophomore Math," in which Pat will complete a measurement unit related to welding.
  - ✓ "Junior English," in which Pat will compose business memos.

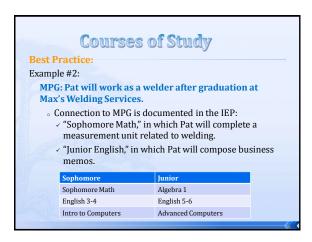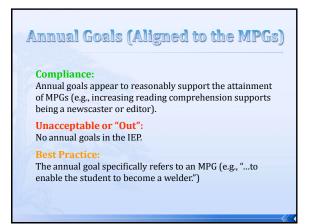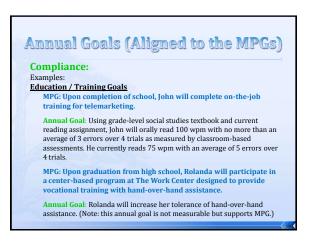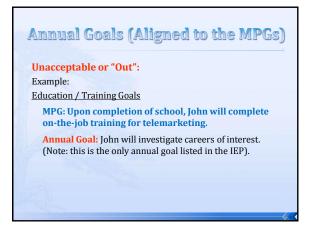| Sophomore	Junior
Sophomore Math	Algebra 1
English 3-4	English 5-6
Intro to Computers	Advanced Computers

Indicator 13 Component #6: Annual Goals

<u>III.A.6:</u> Documentation of annual IEP goals that will reasonably enable the student to meet the postsecondary goals.
(Page D37)

Annual Goals (Aligned to the MPGs)

Compliance:
Annual goals appear to reasonably support the attainment of MPGs (e.g., increasing reading comprehension supports being a newscaster or editor).

Unacceptable or "Out":
No annual goals in the IEP.

Best Practice:
The annual goal specifically refers to an MPG (e.g., "…to enable the student to become a welder.")

Annual Goals (Aligned to the MPGs)

Compliance:
Examples:
Education / Training Goals

MPG: Upon completion of school, John will complete on-the-job training for telemarketing.

Annual Goal: Using grade-level social studies textbook and current reading assignment, John will orally read 100 wpm with no more than an average of 3 errors over 4 trials as measured by classroom-based assessments. He currently reads 75 wpm with an average of 5 errors over 4 trials.

MPG: Upon graduation from high school, Rolanda will participate in a center-based program at The Work Center designed to provide vocational training with hand-over-hand assistance.

Annual Goal: Rolanda will increase her tolerance of hand-over-hand assistance. (Note: this annual goal is not measurable but supports MPG.)

Annual Goals (Aligned to the MPGs)

Unacceptable or "Out":
Example:
Education / Training Goals

MPG: Upon completion of school, John will complete on-the-job training for telemarketing.

Annual Goal: John will investigate careers of interest. (Note: this is the only annual goal listed in the IEP).

Annual Goals (Aligned to the MPGs)

Best Practice:
Examples:
Education/Training Goals

MPG: Upon completion of school, John will complete on-the-job training for a telemarketing job.

Annual Goal: Using grade-level social studies textbook and current reading assignment, John will orally read 100 wpm with no more than an average of 3 errors over 4 trials to prepare *to be a telemarketer* as measured by classroom-based assessments. He currently reads 75 wpm with an average of 5 errors over 4 trials.

MPG: Upon graduation from high school, Rolanda will participate in a center-based program at The Work Center designed to provide vocational training with hand-over-hand assistance.

Annual Goal: Rolanda will increase her tolerance of hand-over-hand assistance from the therapy practitioner from 30 minutes to 45 minutes during 3 out of 5 sessions per week to participate in the completion of a chore at home.

Indicator 13 Component #7: Student Invitation

III.A.6: Documentation that the student who is at least 16 years of age was invited to the IEP meeting when postsecondary transition services were being discussed.
(Page D42)

Student Invitation

Compliance:
- Student's name is on the IEP section (if he or she attended); or
- Clear documentation that the student was invited to participate in the IEP if he or she chose not to attend.

Unacceptable or "Out":
- No documentation that the student was invited and / or student's name not included on the participation portion of the IEP.

Student Invitation

Best Practice:
- A separate invitation form (with a date on it) invites the student to participate in the IEP because transition services will be discussed and records whether the student will or will not attend; or
- Clear documentation that the student's ideas are represented at the IEP meeting even though she or he chose to be absent.

Indicator 13 Component #8: Outside Agency Participation

III.A.6: Evidence that a representative of another agency that is likely to provide and / or pay for transition services has been invited to the meeting *after consent* *from the parent or student who has reached the age of majority.*
(Page D40)

Outside Agency Participation (with PRIOR consent)

Compliance:
Any combination of forms separate from the IEP that documents the consent date

and...

the agency name appears on the IEP and / or other invitation notification with a date on it,

which taken together,

document that consent was given prior to the date the invitation was sent to the agency.

Outside Agency Participation (with PRIOR consent)

Unacceptable or "Out":

No documentation that the consent was obtained prior to an invitation;

or
No documentation that the invitation to the outside agency was given after consent was obtained.

Note: Checkboxes for consent and / or invitation are not acceptable.

Outside Agency Participation (with PRIOR consent)

Best Practice:

The PEA creates a separate form documenting when the consent to invite an outside agency was received. The form shows a separate date the outside agency invitation was sent **and** that date is **clearly after** the date consent was obtained.

Monitoring Guide Steps: Transition

III.A.7: Additional Postsecondary Transition Components.
(Page D42-D43)

Transfer of Rights at Age of Majority

III.A.7: By age 17, the student's IEP must contain a statement that the student has been informed of his or her rights that will transfer to the student at age 18.
(Page D42)

Transfer of Student Rights at the Age of Majority

Compliance:
The date documented in the IEP is not less than one year prior to the date the student turns the age of majority.

Unacceptable or "Out":
If the student is turning 17 in the *current IEP year* and there is no evidence that the student and parent have been informed that rights transfer.

Best Practice:
If a transfer of rights process is not documented anywhere in the individual's file, complete the transfer of rights process as soon as you can and document its completion. It's better than allowing the transfer of rights process not to be completed.

Summary of Performance (SoP)

III.A.7: There is documentation of a summary of academic achievement and functional performance including recommendations to assist an exiting student in meeting her or his postsecondary goals.
(Page D43)

Summary of Performance

Compliance:
There is documentation that includes three components:
1. Summary of academic achievement.
2. Summary of functional performance.
3. Recommendations on how to assist the student in meeting his or her MPGs (e.g., modifications, accommodations, and *assistive technology*).

Unacceptable or "Out":
- The PEA has documentation of summaries of performance but not all three components are included; or
- There are no summaries of performance.

Summary of Performance

Best Practice:

If you are using an updated psychoeducational evaluation as your SoP, be sure of two things:

- Somewhere on or in the psychoeducational evaluation, there is clarification that it is serving as the SoP. An SoP is required; an updated psychoeducational evaluation is not.

- The three required components are clearly "labeled."
    1. Summary of academic achievement.
    2. Summary of functional performance.
    3. Recommendations on how to assist the student in meeting her or his MPGs (e.g., modifications, accommodations, and *assistive technology).*

Resources

- **ADE/ESS 2011-2012 Arizona Monitoring System Manual:** http://www.ade.az.gov/ess/programsupport/
- **ADE/ESS Secondary Transition:** http://www.ade.state.az.us/ess/SpecialProjects/transition
- Division on Career Development and Transition: http://www.dcdt.org
- NSTTAC: http://www.nsttac.org/
- NPSO: http://www.psocenter.org
- Mountain Plains Regional Resource Center: http://www.rrfcnetwork.org/mprrc
- Transition Coalition: http://www.transitioncoalition.org

Contact Us

Each PEA is assigned a Program Specialist for compliance technical support and guidance.

Transition and Program Specialists can be reached at the main ADE number for each regional office:

- Phoenix: (602) 542-4013
- Flagstaff: (928) 679-8100
- Tucson: (520) 628-6330